

**UNITED STATES' MOTION REGARDING COCONSPIRATOR STATEMENTS**  
**APPENDIX E – OTHER DOCUMENTS**

<b>Exhibit #</b>	<b>Identity of the Testifying Witness and/or the Source of the Coconspirator Statement</b>	<b>Statement Describing the Witness and/or the Source of the Coconspirator Statement</b>	<b>A Summary of the Evidence Showing That the Proffering Witness, if a Coconspirator, Knew About and Participated in the Conspiracy</b>	<b>Summary of Statement</b>	<b>The Specific Coconspirator Statements to Be Introduced Via That Witness and/or the Source of the Coconspirator Statement</b>	<b>The Identity of the Declarant of Each Specific Coconspirator Statement</b>	<b>A Summary of the Evidence Showing That Each Declarant of the Coconspirator Statement(s) Knew About and Participated in the Conspiracy</b>	<b>Date</b>
103 through 104	Miguel De Sanz	Miguel De Sanz is a real estate investor who purchased properties at the real estate foreclosure auctions with partners John Shiells and Douglas Ditmer. De Sanz operated a company called De Sanz Realty while working as a partner for John Shiells's company, Shiells Realty.	De Sanz admitted during interviews that he reached agreements to rig bids, participated in rounds, and made and received payoffs involving defendants in Alameda County. De Sanz pleaded guilty to bid rigging and mail fraud in Alameda, Contra Costa, and San Francisco counties between June 2007 and January 2011. Other witnesses and documents, including his own, corroborate De Sanz's admissions.	Checks from De Sanz to defendant Rasheed with memo lines referring to property addresses.	See highlighted portion.	Miguel De Sanz	Same	November 3, 2009 May 26, 2010

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134 through 135	Brian McKinzie	Brian McKinzie is a real estate investor who purchased properties at the foreclosure auctions in Alameda County through his company, Passline Investments.	McKinzie admitted that he reached agreements to rig bids, participated in rounds, and made and received payoffs involving defendants for auctioned properties. McKinzie pleaded guilty to bid rigging and mail fraud in connection with real estate foreclosure auctions in Alameda and Contra Costa counties between November 2008 and January 2011. Other witnesses and documents, including his own, corroborate McKinzie's admissions.	Checks from American Foreclosure Investment Corp to defendants Al Florida and Robert Rasheed with memo lines "5985 Corte Arboles." Check from Robert Kramer and Gregory Greer to McKinzie for \$4,480.00 with memo line "Berlin."	See highlighted portion of documents.	Brian McKinzie Robert Kramer	Same	April 8, 2010 August 19, 2010

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135, 206 through 211, 215 through 225	Mark and Bradley Roemer	The Roemers worked for a company that bought and resold foreclosure properties in Alameda County. Mark Roemer was the principal of the company and Brad Roemer was an employee.	Mark and Brad Roemer admitted that they reached agreements to rig bids, participated in rounds, and made and received payoffs involving defendants for auctioned properties. They pleaded guilty to bid rigging and mail fraud in connection with real estate foreclosure auctions in Alameda County between 2009 and 2010. Other witnesses and documents, including their own, corroborate the Roemers' admissions.	Checks, bank statements, and spreadsheets showing payments from Ivy Properties, LLC to coconspirators including defendants Rasheed and Alvin Florida/Realty Information Systems  Check from Robert Kramer and Gregory Greer to Brad Roemer for \$2,080.00 with memo line "Berlin."	See highlighted portions of documents.	Brad Roemer Mark Roemer	Same	November 2009 through August 2010

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151 through 153	John Shiells	John Shiells is a real estate investor and hard money lender who purchased properties at the foreclosure auctions in Alameda County through his company, Shiells Realty. Shiells worked with partners Miguel De Sanz and Douglas Ditmer at his company.	Shiells admitted during his interviews with the FBI that he reached agreements to rig bids, participated in numerous rounds, and made and received payoffs involving defendants for auctioned properties. Shiells pleaded guilty to three counts of bid rigging (Alameda, Contra Costa, and San Francisco counties) and three counts of mail fraud (Alameda, Contra Costa, and San Francisco counties) between June 2007 and January 2011. Other witnesses and documents corroborate Shiells's admissions.	<p>A check from John S Shiells to Robert Rasheed for \$5650.00 with memo line "Kelly St."</p> <p>Net sheets listing expenses for Javier Sanchez, Robert Rasheed, Brian McKinzie, Doug Ditmer, and Ray Yeganeh.</p> <p>QuickBooks printout containing payments owed by John Shiells to Javier Sanchez, Defendant Rasheed, Brian McKinzie, Doug Ditmer, and Ray Yeganeh on an Alameda property.</p>	See highlighted portion.	John Shiells	Same	February 18, 2009 (for check)